

KELLNER HERLIHY GETTY & FRIEDMAN, LLP

470 PARK AVENUE SOUTH, 7th FLOOR

NEW YORK, NEW YORK 10016

DOUGLAS A. KELLNER
CAROL ANNE HERLIHY
EUGENE F. GETTY
ALAN M. FRIEDMAN
JEANNE-MARIE WILLIAMS
THOMAS VANDENABEELE
CHARLES E. KRAUSCHE II
OLGA V. PETROVSKY

DERRICK M. NG
MICHELLE D. BAZINET
JAEMYUNG JAE LEE
MERIELEN DAL RI ZIVIANI^o
LOUISE GRÉGOIRE
EDI EBIEFUNG
BRENDAN SULLIVAN

TELEPHONE: (212) 889-2121

FACSIMILE: (212) 684-6224

dak@khgflaw.com

COUNSEL

MICHAEL H. SINGER
ROBERT P. MCGREEVY
HERMAN D. FARRELL III
DMITRIY BOGORODSKIY^o

^o Qualified in the Russian
Federation
^o Admitted in Brazil

October 27, 2025

The Honorable Rachel P. Kovner
United States District Judge
Eastern District of New York
255 Cadman Plaza East
Brooklyn, New York 11201

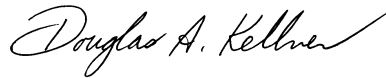
United States v. Shares of 21 East 61st Street Apartment Corp. et al.
Civil Docket No. 24-2147

Dear Judge Kovner:

Our firm represents Lovitas, Inc. and Baloas, Inc., the corporate entities that own the properties at issue in this civil forfeiture action, and Dr. Hak Seon Kim ("Dr. Kim"), the ultimate beneficial owner of the properties (collectively, the "Claimants").

The parties have conferred. Claimants propose to file a motion to dismiss the complaint by December 15, 2026; the government will respond by January 30, 2026, with a reply to be submitted by February 23, 2026.

Respectfully,



Douglas A. Kellner
Attorneys for Claimants